

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

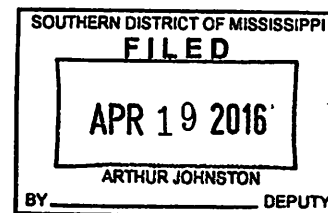
UNITED STATES OF AMERICA

v.

CRIMINAL NO. *3:16cr29HTW-LRA*

SACHIN GIRISHKUMAR PATEL,
TARUNKUMAR PURUSHOTTAMBHAI PATEL,
SIMPSON LLOYD GOODMAN,
CHIRAG NILESH PATEL,
DANA CHEETARA ADAMS,
BRANDY NICOLE EDWARDS,
TERILYNN RANKIN,
SEJAL SANJAY KAKADIA,
JAYANTIBHAI KALIDAS CHAUDHARI,
VIRENDRA RAMBACHAN RAJPUT, and
JAVONA SHANICE RAJPUT

18 U.S.C. § 371
18 U.S.C. § 1341
18 U.S.C. § 1343
18 U.S.C. § 1546
8 U.S.C. § 1325(c)



The Grand Jury charges:

At all times relevant to this Indictment

1. Defendant **CHIRAG NILESH PATEL** is a citizen of India. He entered the United States in or about 2011. On or about January 27, 2014, he married defendant **DANA**

CHEETARA ADAMS, who is a citizen of the United States, in Hinds County, Mississippi.

2. Defendant **BRANDY NICOLE EDWARDS** is a United States citizen. On or about October 7, 2013, she married Bipin Kantibhai Shingala, a citizen of India, in Hinds County, Mississippi.

3. Defendant **SEJAL SANJAY KAKADIA** is a citizen of the United States. On or about September 15, 2014, she married defendant **JAYANTIBHAI KALIDAS CHAUDHARI**, a citizen of India, in Hinds County, Mississippi.

4. Defendant **VIRENDRA RAMBACHAN RAJPUT** was born in India and is a

citizen of that country. On or about December 8, 2011, he married defendant **JAVONA SHANICE RAJPUT**, a citizen of the United States, in Hinds County, Mississippi.

5. The United States Department of Homeland Security (“DHS”), U.S. Citizenship and Immigration Services (“USCIS”) Form I-130, Petition for Alien Relative, is a form that may be submitted by a United States citizen on behalf of a non-citizen relative in support of the non-citizen’s application for United States immigration benefits.

6. DHS USCIS Form I-485, Application to Register Permanent Residence or Adjust Status, is a form typically submitted by an alien seeking a change in his or her immigration status.

COUNT 1

7. Beginning in or about December 8, 2011, and continuing through the date of this Indictment, in Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **SACHIN GIRISHKUMAR PATEL, TARUNKUMAR PURUSHOTTAMBHAI PATEL, SIMPSON LLOYD GOODMAN, CHIRAG NILESH PATEL, DANA CHEETARA ADAMS, BRANDY NICOLE EDWARDS, TERILYNN RANKIN, SEJAL SANJAY KAKADIA, JAYANTIBHAI KALIDAS CHAUDHARI, VIRENDRA RAMBACHAN RAJPUT**, and **JAVONA SHANICE RAJPUT** knowingly and willfully conspired and agreed together and with each other, and with other persons both known and unknown to the Grand Jury, to commit offenses against the United States, and any agency thereof, that is they did knowingly and unlawfully enter into marriages for the purpose of evading provisions of the immigration laws of the United States, knowing such conduct was unlawful, as set forth below and in violation of Title 8, United States Code, Section 1325(c).

Object and Manner and Means of the Conspiracy

8. It was the object of the conspiracy that the aliens who were citizens of India would attempt to obtain beneficial immigration status.

9. It was a part of the conspiracy that the defendants would by deceit, craft, trickery and dishonest means, defraud the United States by interfering with and obstructing the lawful governmental functions of the USCIS, in that the defendants would enter into marriages between persons who were already citizens of the United States solely for the purpose of obtaining immigration status to which the aliens would not otherwise be entitled. These marriages were not entered into because of mutual love and affection between the parties but rather solely to create a legal status that would provide a basis for immigration status for the alien partner and usually for some economic benefit to the United States citizen.

10. It was further a part of the conspiracy that the defendants would submit various forms and applications to USCIS, including but not limited to, Forms I-130, Petition for Alien Relative, Forms I-485, Application to Register Permanent Resident or Adjust Status, Forms I-131, Application for Travel Document, and Forms I-765, Application for Employment Authorization, Forms G-28, Notice of Entry of Appearance as Attorney or Accredited Representative, and Forms I-290B, Notice of Appeal or Motion. The defendants would falsely represent their eligibility for immigration status in these forms by falsely and fraudulently representing the statuses of their marriages.

Overt Acts

11. In furtherance of the conspiracy and to affect the objects of the conspiracy, the following overt acts, among others, were committed in the Northern Division of the Southern District of Mississippi and elsewhere:

- a. On or about January 27, 2014, in Hinds County, in the Northern Division of the Southern District of Mississippi, **CHIRAG NILESH PATEL** married **DANA CHEETARA ADAMA**.
- b. On or about October 7, 2013, in Hinds County, in the Northern Division of the Southern District of Mississippi, **BRANDY NICOLE EDWARDS** married Bipin Kantibhai Shingala.
- c. On or about September 15, 2014, in the Northern Division of the Southern District of Mississippi, **SEJAL SANJAY KAKADIA** married **JAYANTIBHAI KALIDAS CHAUDHARI**.
- d. On or about December 8, 2011, in Hinds County, in the Northern Division of the Southern District of Mississippi, **VIRENDRA RAMBACHAN RAJPUT** married **JAVONA SHANICE RAJPUT**.
- e. On or about October 21, 2014, **SIMPSON LLOYD GOODMAN** submitted a Form I-130 and I-485 for **CHIRAG NILESH PATEL**.
- f. On or about October 21, 2014, **SIMPSON LLOYD GOODMAN** submitted a Form I-130 and I-485 for **BIPIN KANTIBHAI**.
- g. On or about April 6, 2015, **SIMPSON LLOYD GOODMAN** submitted a Form I-130 and I-485 for **JAYANTIBHAI KALIDAS CHAUDHARI**.

h. On or about June 2, 2015, **TERILYNN RANKIN** sent an email to **SACHIN GIRISHKUMAR PATEL** containing a tax return for **CHIRAG NILESH PATEL** and **DANA CHEETARA ADAMS**.

All in violation of Title 18, United States Code, Section 371.

COUNT 2

From on or about January 27, 2014, through the date of this Indictment, in Hinds County, in the Northern Division of the Southern District of Mississippi, the defendants, **SACHIN GIRISHKUMAR PATEL, TARUNKUMAR PURUSHOTTAMBHAI PATEL, SIMPSON LLOYD GOODMAN, CHIRAG NILESH PATEL, DANA CHEETARA ADAMS, and TERILYNN RANKIN**, knowingly and unlawfully entered into, or aided and abetted others to enter into, a marriage for the purpose of evading a provision of the immigration laws of the United States.

All in violation of Title 8, United States Code, Section 1325(c) and Title 18, United States Code, Section 2.

COUNT 3

From on or about October 7, 2013, through the date of this Indictment, in Hinds County, in the Northern Division of the Southern District of Mississippi, the defendants, **SACHIN GIRISHKUMAR PATEL, TARUNKUMAR PURUSHOTTAMBHAI PATEL, SIMPSON LLOYD GOODMAN, BRANDY NICOLE EDWARDS, and TERILYNN RANKIN**, knowingly and unlawfully entered into, or aided and abetted others to enter into, a marriage for the purpose of evading a provision of the immigration laws of the United States.

All in violation of Title 8, United States Code, Section 1325(c), and Title 18, United States Code, Section 2.

COUNT 4

From on or about September 15, 2014, through the date of this Indictment, in Hinds County, in the Northern Division of the Southern District of Mississippi, the defendants, **SACHIN GIRISHKUMAR PATEL, SIMPSON LLOYD GOODMAN, SEJAL SANJAY KAKADIA,** and **JAYANTIBHAI KALIDAS CHAUDHARI**, knowingly and unlawfully entered into, or aided and abetted others to enter into, a marriage for the purpose of evading a provision of the immigration laws of the United States.

All in violation of Title 8, United States Code, Section 1325(c) and Title 18, United States Code, Section 2.

COUNT 5

From on or about December 8, 2011, through the date of this Indictment, in Hinds County, in the Northern Division of the Southern District of Mississippi, the defendants, **TARUNKUMAR PURUSHOTTAMBHAI PATEL, SIMPSON LLOYD GOODMAN, VIRENDRA RAMBACHAN RAJPUT,** and **JAVONA SHANICE RAJPUT**, knowingly and unlawfully entered into, or aided and abetted others to enter into, a marriage for the purpose of evading a provision of the immigration laws of the United States.

All in violation of Title 8, United States Code, Section 1325(c) and Title 18, United States Code, Section 2.

COUNT 6

From on or about October 17, 2014, through the date of this Indictment, in Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **SACHIN GIRISHKUMAR PATEL, TARUNKUMAR PURUSHOTTAMBHAI PATEL, SIMPSON LLOYD GOODMAN, CHIRAG NILESH PATEL, DANA CHEETARA ADAMS, and TERILYNN RANKIN**, did willfully and knowingly make, and aided and abetted others to make, under oath and penalty of perjury, and subscribe as true, any false statement with respect to a material fact in any application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and knowingly presented such application, affidavit and other document which contains any such false statement; to wit: they made, submitted and subscribed to Forms I-130, and I-485, on the basis of marriages between a United States citizen and a citizen of India, knowing such marriages to be shams.

All in violation of Title 18, United States Code, Sections 1546 and 2.

COUNT 7

From on or about August 26, 2014, through the date of this Indictment, in Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **SACHIN GIRISHKUMAR PATEL, TARUNKUMAR PURUSHOTTAMBHAI PATEL, SIMPSON LLOYD GOODMAN, BRANDY NICOLE EDWARDS, and TERILYNN RANKIN** did willfully and knowingly make, and aided and abetted others to make, under oath and penalty of perjury, and subscribe as true, any false statement with respect to a material fact in any application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and knowingly presented such application, affidavit and other document

which contains any such false statement; to wit: they made, submitted and subscribed to Forms I-130, and I-485, on the basis of marriages between a United States citizen and a citizen of India, knowing such marriages to be shams.

All in violation of Title 18, United States Code, Sections 1546 and 2.

COUNT 8

From on or about April 3, 2015, through the date of this Indictment, in Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **SACHIN GIRISHKUMAR PATEL, SIMPSON LLOYD GOODMAN, SEJAL SANJAY KAKADIA, and JAYANTIBHAI KALIDAS CHAUDHARI**, did willfully and knowingly make, and aided and abetted others to make, under oath and penalty of perjury, and subscribe as true, any false statement with respect to a material fact in any application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and knowingly presented such application, affidavit and other document which contains any such false statement; to wit: they made, submitted and subscribed to Forms I-130, and I-485, on the basis of marriages between a United States citizen and a citizen of India, knowing such marriages to be shams.

All in violation of Title 18, United States Code, Sections 1546 and 2.

COUNT 9

From on or about February 16, 2012, through the date of this Indictment, in Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **TARUNKUMAR PURUSHOTTAMBHAI PATEL, SIMPSON LLOYD**

GOODMAN, VIRENDRA RAMBACHAN RAJPUT, and JAVONA SHANICE RAJPUT, did willfully and knowingly make, and aided and abetted others to make, under oath and penalty of perjury, and subscribe as true, any false statement with respect to a material fact in any application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and knowingly presented such application, affidavit and other document which contains any such false statement; to wit: they made, submitted and subscribed to Forms I-130, and I-485, on the basis of marriages between a United States citizen and a citizen of India, knowing such marriages to be shams.

All in violation of Title 18, United States Code, Sections 1546 and 2.

COUNT 10

1. Beginning on or about September 15, 2014, and continuing through the date of this Indictment, in Hinds County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **SACHIN GIRISHKUMAR PATEL, SIMPSON LLOYD GOODMAN, SEJAL SANJAY KAKADIA, and JAYANTIBHAI KALIDAS CHAUDHARI** devised and intended to devise a scheme and artifice to defraud USCIS, and did knowingly use and cause to be used the U.S. Mails for the purpose of executing the scheme and attempting to do so.

2. To accomplish its fraudulent purposes, the defendants, **SACHIN GIRISHKUMAR PATEL, SIMPSON LLOYD GOODMAN, SEJAL SANJAY KAKADIA, and JAYANTIBHAI KALIDAS CHAUDHARI,** aided and abetted by others both known and unknown to the Grand Jury, engaged in and caused various acts and transactions which were designed to and which enabled defendants to attempt to obtain non-citizen's immigration benefits and/or in an effort to change or eliminate conditions on the applicant's residency status in the United States from USCIS.

3. It was a part of the scheme and artifice to defraud that the defendants would falsify government forms and/or other documents for the purpose of attempting to obtain non-citizen's immigration benefits and/or in an effort to change or eliminate conditions on the applicant's residency status in the United States from USCIS.

4. It was further a part of the scheme and artifice to defraud that the defendants would submit false addresses and/or other information to USCIS, in an attempt to obtain non-citizen's immigration benefits and/or in an effort to change or eliminate conditions on the applicant's residency status in the United States from USCIS.

5. The defendants, **SACHIN GIRISHKUMAR PATEL, SIMPSON LLOYD GOODMAN, SEJAL SANJAY KAKADIA, and JAYANTIBHAI KALIDAS CHAUDHARI**, on or about April 6, 2015, for the purpose of executing the aforesaid scheme and artifice, and attempting to do so, knowingly caused to be delivered by mail according to the direction thereon, from Jackson, Mississippi, to Chicago, Illinois, a letter containing certain documents, including a Form I-130, and Form I-485.

All in violation of Sections 1341 and 2, Title 18, United States Code.

COUNT 11

1. Beginning on or about December 8, 2011, and continuing through the date of this Indictment, in Hinds County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **TARUNKUMAR PURUSHOTTAMBHAI PATEL, SIMPSON LLOYD GOODMAN, VIRENDRA RAMBACHAN RAJPUT, and JAVONA SHANICE RAJPUT**, devised and intended to devise a scheme and artifice to defraud USCIS, and did knowingly use and cause to be used the U.S. Mails for the purpose of executing the scheme and

attempting to do so.

2. To accomplish its fraudulent purposes, the defendants, **TARUNKUMAR PURUSHOTTAMBHAI PATEL, SIMPSON LLOYD GOODMAN, VIRENDRA RAMBACHAN RAJPUT, and JAVONA SHANICE RAJPUT**, aided and abetted by others both known and unknown to the Grand Jury, engaged in and caused various acts and transactions which were designed to and which enabled defendants to attempt to obtain non-citizen's immigration benefits and/or in an effort to change or eliminate conditions on the applicant's residency status in the United States from USCIS.

3. It was a part of the scheme and artifice to defraud that the defendants would falsify government forms and/or other documents for the purpose of attempting to obtain non-citizen's immigration benefits and/or in an effort to change or eliminate conditions on the applicant's residency status in the United States from USCIS.

4. It was further a part of the scheme and artifice to defraud that the defendants would submit false addresses and/or other information to USCIS, in an attempt to obtain a non-citizen's immigration benefits and/or in an effort to change or eliminate conditions on the applicant's residency status in the United States from USCIS.

5. That the defendants, **TARUNKUMAR PURUSHOTTAMBHAI PATEL, SIMPSON LLOYD GOODMAN, VIRENDRA RAMBACHAN RAJPUT, and JAVONA SHANICE RAJPUT** on or about January 23, 2015, for the purpose of executing the aforesaid scheme and artifice, and attempting to do so, knowingly caused to be delivered by mail according to the direction thereon, from Jackson, Mississippi, to New Orleans, Louisiana, a package

containing certain documents, including a Form G-28, a lease agreement, and a tax return.

All in violation of Sections 1341 and 2, Title 18, United States Code.

COUNTS 12 and 13

1. Beginning on or about December 8, 2011, and continuing through the date of this Indictment, in Hinds County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **TARUNKUMAR PURUSHOTTAMBHAI PATEL**, and **SIMPSON LLOYD GOODMAN**, **VIRENDRA RAMBACHAN RAJPUT**, and **JAVONA SHANICE RAJPUT** devised and intended to devise a scheme and artifice to defraud USCIS, and did knowingly use and cause to be used interstate wire communications for the purpose of executing the scheme and attempting to do so.

2. To accomplish its fraudulent purposes, the defendants, **TARUNKUMAR PURUSHOTTAMBHAI PATEL**, **SIMPSON LLOYD GOODMAN**, **VIRENDRA RAMBACHAN RAJPUT**, and **JAVONA SHANICE RAJPUT**, aided and abetted by others both known and unknown to the Grand Jury, engaged in and caused various acts and transactions which were designed to and which enabled defendants to attempt to obtain non-citizen's immigration benefits and/or in an effort to change or eliminate conditions on the applicant's residency status in the United States from USCIS.

3. It was a part of the scheme and artifice to defraud that the defendants would falsify government forms and/or other documents for the purpose of attempting to obtain non-citizen's immigration benefits and/or in an effort to change or eliminate conditions on the applicant's residency status in the United States from USCIS.

4. It was further a part of the scheme and artifice to defraud that the defendants would

submit false addresses and/or other information to USCIS, in an attempt to obtain non-citizen's immigration benefits and/or in an effort to change or eliminate conditions on the applicant's residency status in the United States from USCIS.

4. On or about the dates set forth below, for the purpose of executing the scheme and in furtherance of the scheme, or attempting to do so, the defendants **TARUNKUMAR PURUSHOTTAMBHAI PATEL, SIMPSON LLOYD GOODMAN, VIRENDRA RAMBACHAN RAJPUT, and JAVONA SHANICE RAJPUT** aided and abetted by others known and unknown to the Grand Jury, for the purpose of carrying out the scheme to defraud and attempting to do so, did knowingly transmit and cause to be transmitted by means of wire or radio communications in interstate commerce, certain writings, signals or sounds. These transmissions in interstate commerce consisted of a wire transfer set forth below:

| <u>COUNT</u> | <u>DATE</u> | <u>DESCRIPTION</u> | <u>AMOUNT</u> |
|--------------|-------------|---|---------------|
| 12 | 01/08/2014 | Wire Transfer from Lawrence, Massachusetts to Bankplus, Yazoo City, Mississippi | \$2000 |
| 13 | 12/01/2014 | Wire Transfer from Lawrence, Massachusetts to Bankplus, Yazoo City Mississippi | \$2000 |

All in violation of Sections 1343 and 2, Title 18, United States Code.

COUNT 14

1. Beginning on or about January 27, 2014, and continuing through the date of this Indictment, in Hinds County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **SACHIN GIRISHKUMAR PATEL, TARUNKUMAR PURUSHOTTAMBHAI PATEL, SIMPSON LLOYD GOODMAN, CHIRAG NILESH**

PATEL, DANA CHEETARA ADAMS, and TERILYNN RANKIN, devised and intended to devise a scheme and artifice to defraud USCIS, and did knowingly use and cause to be used interstate wire communications for the purpose of executing the scheme and attempting to do so.

2. To accomplish its fraudulent purposes, the defendants, **SACHIN GIRISHKUMAR PATEL, TARUNKUMAR PURUSHOTTAMBHAI PATEL, SIMPSON LLOYD GOODMAN, CHIRAG NILESH PATEL, DANA CHEETARA ADAMS, and TERILYNN RANKIN** aided and abetted by others both known and unknown to the Grand Jury, engaged in and caused various acts and transactions which were designed to and which enabled defendants to attempt to obtain non-citizen's immigration benefits and/or in an effort to change or eliminate conditions on the applicant's residency status in the United States from USCIS.

3. It was a part of the scheme and artifice to defraud that the defendants would falsify government forms and/or other documents for the purpose of attempting to obtain non-citizen's immigration benefits and/or in an effort to change or eliminate conditions on the applicant's residency status in the United States from USCIS.

3. It was further a part of the scheme and artifice to defraud that the defendants would submit false addresses and/or other information to USCIS, in an attempt to obtain non-citizen's immigration benefits and/or in an effort to change or eliminate conditions on the applicant's residency status in the United States from USCIS.

5. On or about the dates set forth below, for the purpose of executing the scheme and in furtherance of the scheme, or attempting to do so, the defendants, **SACHIN GIRISHKUMAR PATEL, TARUNKUMAR PURUSHOTTAMBHAI PATEL, SIMPSON LLOYD GOODMAN, CHIRAG NILESH PATEL, DANA CHEETARA ADAMS, and TERILYNN RANKIN**, aided

and abetted by others known and unknown to the Grand Jury, for the purpose of carrying out the scheme to defraud and attempting to do so, did knowingly transmit and cause to be transmitted by means of wire or radio communications in interstate commerce, certain writings, signals or sounds. These transmissions in interstate commerce consisted of a wire transfer of fingerprints of **CHIRAG NILESH PATEL** as set forth below:

| <u>COUNT</u> | <u>DATE</u> | <u>DESCRIPTION</u> |
|--------------|-------------|--|
| 14 | 12/24/2014 | A Wire Transfer of fingerprints from Jackson, Mississippi to West Virginia |

All in violation of Sections 1343 and 2, Title 18, United States Code.

COUNT 15

1. Beginning on or about October 7, 2013, and continuing through the date of this Indictment, in Hinds County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **SACHIN GIRISHKUMAR PATEL, TARUNKUMAR PURUSHOTTAMBHAI PATEL, SIMPSON LLOYD GOODMAN, BRANDY NICOLE EDWARDS,** and **TERILYNN RANKIN** devised and intended to devise a scheme and artifice to defraud USCIS, and did knowingly use and cause to be used interstate wire communications for the purpose of executing the scheme and attempting to do so.

2. To accomplish its fraudulent purposes, the defendants, **SACHIN GIRISHKUMAR PATEL, TARUNKUMAR PURUSHOTTAMBHAI PATEL, SIMPSON LLOYD GOODMAN, BRANDY NICOLE EDWARDS,** and **TERILYNN RANKIN** aided and abetted by others both known and unknown to the Grand Jury, engaged in and caused various acts and transactions which were designed to and which enabled defendants to attempt to obtain non-citizen's immigration benefits and/or in an effort to change or eliminate conditions on the applicant's residency status in

the United States from USCIS.

3. It was a part of the scheme and artifice to defraud that the defendants would falsify government forms and/or other documents for the purpose of attempting to obtain non-citizen's immigration benefits and/or in an effort to change or eliminate conditions on the applicant's residency status in the United States from USCIS.

4. It was further a part of the scheme and artifice to defraud that the defendants would submit false addresses and/or other information to USCIS, in an attempt to obtain non-citizen's immigration benefits and/or in an effort to change or eliminate conditions on the applicant's residency status in the United States from USCIS.

5. On or about the dates set forth below, for the purpose of executing the scheme and in furtherance of the scheme, or attempting to do so, the defendants, **SACHIN GIRISHKUMAR PATEL, TARUNKUMAR PURUSHOTTAMBHAI PATEL, SIMPSON LLOYD GOODMAN, BRANDY NICOLE EDWARDS, and TERILYNN RANKIN**, aided and abetted by others known and unknown to the Grand Jury, for the purpose of carrying out the scheme to defraud and attempting to do so, did knowingly transmit and cause to be transmitted by means of wire or radio communications in interstate commerce, certain writings, signals or sounds. These transmissions in interstate commerce consisted of a wire transfer of fingerprints of Bipin Kantibhai Shingala as set forth below:

| <u>COUNT</u> | <u>DATE</u> | <u>DESCRIPTION</u> |
|--------------|-------------|--|
| 15 | 12/24/2014 | A Wire Transfer of fingerprints from Jackson, Mississippi to West Virginia |

All in violation of Sections 1343 and 2, Title 18, United States Code.

COUNT 16

1. Beginning on or about September 15, 2014, and continuing through the date of this Indictment, in Hinds County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **SACHIN GIRISHKUMAR PATEL, SIMPSON LLOYD GOODMAN, SEJAL SANJAY KAKADIA, and JAYANTIBHAI KALIDAS CHAUDHARI**, devised and intended to devise a scheme and artifice to defraud USCIS, and did knowingly use and cause to be used interstate wire communications for the purpose of executing the scheme and attempting to do so.

2. To accomplish its fraudulent purposes, the defendants, **SACHIN GIRISHKUMAR PATEL, SIMPSON LLOYD GOODMAN, SEJAL SANJAY KAKADIA, and JAYANTIBHAI KALIDAS CHAUDHARI**, aided and abetted by others both known and unknown to the Grand Jury, engaged in and caused various acts and transactions which were designed to and which enabled defendants to attempt to obtain non-citizen's immigration benefits and/or in an effort to change or eliminate conditions on the applicant's residency status in the United States from USCIS.

3. It was a part of the scheme and artifice to defraud that the defendants would falsify government forms and/or other documents for the purpose of attempting to obtain non-citizen's immigration benefits and/or in an effort to change or eliminate conditions on the applicant's residency status in the United States from USCIS.

4. It was further a part of the scheme and artifice to defraud that the defendants would submit false addresses and/or other information to USCIS, in an attempt to obtain non-citizen's immigration benefits and/or in an effort to change or eliminate conditions on the applicant's residency status in the United States from USCIS.

5. On or about the dates set forth below, for the purpose of executing the scheme and in furtherance of the scheme, or attempting to do so, the defendants, **SACHIN GIRISHKUMAR PATEL, SIMPSON LLOYD GOODMAN, SEJAL SANJAY KAKADIA, and JAYANTIBHAI KALIDAS CHAUDHARI**, aided and abetted by others known and unknown to the Grand Jury, for the purpose of carrying out the scheme to defraud and attempting to do so, did knowingly transmit and cause to be transmitted by means of wire or radio communications in interstate commerce, certain writings, signals or sounds. These transmissions in interstate commerce consisted of a wire transfer of fingerprints of **JAYANTIBHAI KALIDAS CHAUDHARI** as set forth below:

| <u>COUNT</u> | <u>DATE</u> | <u>DESCRIPTION</u> |
|--------------|-------------|--|
| 16 | 07/14/2015 | A Wire Transfer of fingerprints from Jackson, Mississippi to West Virginia |

All in violation of Sections 1343 and 2, Title 18, United States Code.


NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses as alleged in this Indictment, the defendants shall forfeit to the United States all proceeds obtained directly or indirectly from the offenses.

Further, if any property described above, as a result of any act or omission of the defendants: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of

any other property of the defendants, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Sections 981(a)(1)(C) and 982(a)(2)(B), Title 18, United States Code, Section 853(p), Title 21, United States Code and Section 2461, Title 28, United States Code.


GREGORY K. DAVIS
United States Attorney

A TRUE BILL: //

Foreperson of the Grand Jury ✓

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this the 19th day of April, 2016.


UNITED STATES MAGISTRATE JUDGE